

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

EARL GAVIN, )  
                        )  
Plaintiff,         )  
                        )  
v.                     ) CASE NO. : 7:18-cv-00523-DCC-JDA  
                        )  
EXPERIAN INFORMATION SOLUTIONS )  
INC., et al.         )  
                        )  
Defendants.         )

**DEFENDANT EQUIFAX INC.'S  
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendant, Equifax Inc. ("Equifax"), by counsel and pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby moves the Court to dismiss this action with prejudice, and grant all other relief that the Court deems appropriate. In support of this motion, Equifax relies upon the accompanying memorandum of law. For the reasons set forth more fully in its accompanying memorandum, Equifax requests that this motion be granted.

Respectfully submitted this 26th day of March, 2018.

*/s/ Rita Bolt Barker*  
Rita Bolt Barker (D.S.C. I.D. No. 10566)  
WYCHE, P.A.  
44 E Camperdown Way  
Greenville, SC 29601  
864-242-8235  
Email: rbarker@wyche.com  
*Attorneys for Defendant Equifax Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing by CM/ECF, which will send notification to the following counsel of record:

Lyndey Ritz Zwingelberg  
Adams and Reese  
1501 Main Street  
Fifth Floor  
Columbia, SC 29201

Wilbur Eugene Johnson  
Young Clement Rivers  
PO Box 993  
Charleston, SC 29402

And via U.S. Mail to:

Earl Gavin  
300 Marion Avenue  
Gaffney, SC 29341

Dated: March 26, 2018.

/s/ *Rita Bolt Barker*